

## **Appendix B [as revised 12/22/03]**

The tables below present impacts from increasing the levels of the production-related waste threshold for Form A Certification Statement eligibility. These analyses are based on data received for TRI reporting year 2001 (submitted in calendar year 2002). **Table 1** presents the 2001 use and potential use of the Form A. **Table 2** presents the estimated potential impacts on reporting facilities when the production-related waste threshold is increased from the current level of 500 lbs. to 1000, 2000 and 5000 lbs. **Table 3** presents the estimated impacts in terms of data lost under the same scenarios presented in **Table 2**. **Table 4** presents the estimated potential impacts on reporting facilities when the production-related waste threshold is modified from 8.1 through 8.7 to 8.1 only. **Table 5** presents the estimated impacts in terms of data lost under the 500, 1000, 2000, and 5000 pound scenarios when the threshold is modified from 8.1 through 8.7 to 8.1 only. **Table 6** presents the estimated potential impacts on reporting facilities when the production-related waste threshold is modified from 8.1 through 8.7 to the aggregate of 8.1, 8.6 and 8.7. **Table 7** presents the estimated impacts in terms of data lost under the 500, 1000, 2000, and 5000 pound scenarios when the threshold is modified from 8.1 through 8.7 to the aggregate of 8.1, 8.6 and 8.7.

Please note that the Appendix has been revised from the version that appears in the stakeholder dialogue paper posted on the TRI website and in the EPA docket. Tables 4 and 5 of the prior version have been renumbered as tables 5 and 7, and new tables 4 and 6 have been added to this version. The values reported for what are now tables 1-3, 5, and 7 are slightly different from those in the prior version because EPA recently updated the TRI data base for RY 2001 to reflect changes or corrections submitted by regulated facilities. Finally, the values in column 2a in the prior version of what are now tables 3, 5, and 7 were intended to be percentages, but were reported as raw decimal values; they are in the proper units in this version.

**Table 1. Reporting Year 2001 Use and Potential Use of the Form A Certification Statement**

	<b>Number of Chemicals Reported on Form A</b>	<b>Percent of Total Forms</b>	<b>Number of Facilities</b>	<b>Percent of All Facilities</b>
<b>Submitted</b>	12,434	12.88	5,186	20.54
<b>Submitted plus Potential Form As</b>	23,056	23.89	9,835	38.95

Notes:

1. "Number of Facilities" refers to the number of facilities that submitted at least 1 Form A Certification Statement.
2. "Potential Form As" are Form Rs that have a total of current year section 8.1 through 8.7 of 500 lbs. or less (it does not exclude those facilities that may have exceeded the 1 million pound reporting threshold since EPA does not have a method to make that estimate).

**Table 2: Estimated Impacts of Various Options on Reporting Facilities (based on 2001 data)**

Scenario	Level (lbs)	Number of Form Rs Lost	Number of Facilities Potentially Affected			
			At Least 1 Form A	Percent of Total Facilities	All Reports on Form A (No Form R)	Percent of Total Facilities
<b>Current Basis (8.1 thru 8.7)</b>	500-full use	10,696	9,835	39.0	4,633	18.3
	1000	13,997	10,758	42.6	5,205	20.6
	2000	17,719	11,718	46.4	5,991	23.7
	5000	23,253	13,323	52.8	7,321	29.0

**Table 3: Estimated Impacts of Various Options (based on 2001 data)**

		(1)	(1a)	(2)	(2a)	Chemicals on Form A Only (3)			
Option	Level (lbs)	Production-Related Waste (8.1.thru 8.7) Pounds not reported on Form R	Percentage of Production - Related Waste (8.1 thru 8.7)	Releases (8.1 + 8.8) Pounds not reported on Form R	Percentage of Releases (8.1 + 8.8)	No. of chemicals for which all reporting qualifies for Form A	No. of Form Rs for those chemicals for which all reporting qualifies for Form A	Quantity(lbs) (8.1-8.7) associated with the Form Rs for those chemicals for which all reporting qualifies for Form A	Quantity (lbs) (8.1 + 8.8) associated with the Form Rs for those chemicals for which all reporting qualifies for Form A
<b>Current Basis (8.1 thru 8.7)</b>	500-Full Use	1,319,296	0.005	3,523,313	0.06	45	31	3,877	1,670
	1000	3,730,814	0.014	5,199,104	0.09	50	39	8,032	3,253
	2000	9,167,616	0.035	8,574,402	0.15	58	56	24,701	11,015
	5000	27,549,842	0.11	18,152,735	0.31	70	91	83,151	17,832

Notes:

1. Total Production-Related Waste (sum 8.1 through 8.7) for reporting year 2001 is 26,221,390,674 pounds (PBTs were excluded from this total).
2. Total "Releases" including releases from non-production related activities (sum 8.1 plus 8.8) for reporting year 2001 is 5,810,918,783 (PBTs were excluded from this total).
3. Chemicals for which all submissions may be limited to Form As (522 toxic chemicals were active in the TRI program in reporting year 2001. Total chemicals reported in 2000 was 528).

**Table 4: Estimated Impacts of Various Options on Reporting Facilities (based on 2001 data)**

Scenario	Level (lbs)	Number of Form Rs Lost	Number of Facilities Potentially Affected			
			At Least 1 Form A	Percent of Total Facilities	All Reports on Form A (No Form R)	Percent of Total Facilities
<b>Modified Basis for Threshold (8.1)</b>	500	28,126	15,377	60.9	8,562	33.9
	1000	33,030	16,286	64.5	9,615	38.1
	2000	37,707	17,098	67.7	10,807	42.8
	5000	43,707	18,191	72.0	12,570	49.8

**Table 5: Estimated Impacts of Various Options (based on 2001 data)**

		(1)	(1a)	(2)	(2a)	Chemicals on Form A Only (3)			
Option	Level (lbs)	Production-Related Waste (8.1.thru 8.7) Pounds not reported on Form R	Percentage of Production - Related Waste (8.1 thru 8.7)	Releases (8.1 + 8.8) Pounds not reported on Form R	Percentage of Releases (8.1 + 8.8)	No. of chemicals for which all reporting qualifies for Form A	No. of Form Rs for those chemicals for which all reporting qualifies for Form A	Quantity (lbs) (8.1-8.7) associated with the Form Rs for those chemicals for which all reporting qualifies for Form A	Quantity (lbs) (8.1 + 8.8) associated with the Form Rs for those chemicals for which all reporting qualifies for Form A
<b>Modified Basis for Threshold (8.1)</b>	500-Full Use	2,810,963,416	10.7	7,485,848	0.13	166	377	13,038,607	23,000
	1000	3,426,733,396	13.1	11,594,869	0.20	184	469	26,038,992	158,403
	2000	4,150,118,128	15.8	18,798,099	0.32	206	661	53,603,956	272,693
	5000	5,552,860,871	21.2	39,586,426	0.68	236	1072	166,499,415	515,977

Notes:

1. Total Production-Related Waste (sum 8.1 through 8.7) for reporting year 2001 is 26,221,390,674 pounds (PBTs were excluded from this total).
2. Total "Releases" including releases from non-production related activities (sum 8.1 plus 8.8) for reporting year 2001 is 5,810,918,783 (PBTs were excluded from this total).
3. Chemicals for which all submissions may be limited to Form As (522 toxic chemicals were active in the TRI program in reporting year 2001. Total chemicals reported in 2000 was 528).

**Table 6: Estimated Impacts of Various Options on Reporting Facilities (based on 2001 data)**

Scenario	Level (lbs)	Number of Form Rs Lost	Number of Facilities Potentially Affected			
			At Least 1 Form A	Percent of Total Facilities	All Reports on Form A (No Form R)	Percent of Total Facilities
<b>Modified Basis for Threshold (8.1, 8.6 and 8.7)</b>	500	19,805	13,348	52.9	7,206	28.5
	1000	24,007	14,356	56.9	8,121	32.2
	2000	28,172	15,241	60.4	9,104	36.1
	5000	33,641	16,465	65.2	10,564	41.8

**Table 7: Estimated Impacts of Various Options (based on 2001 data)**

		(1)	(1a)	(2)	(2a)	Chemicals on Form A Only (3)			
Option	Level (lbs)	Production-Related Waste (8.1.thru 8.7) Pounds not reported on Form R	Percentage of Production - Related Waste (8.1 thru 8.7)	Releases (8.1 + 8.8) Pounds not reported on Form R	Percentage of Releases (8.1 + 8.8)	No. of chemicals for which all reporting qualifies for Form A	No. of Form Rs for those chemicals for which all reporting qualifies for Form A	Quantity (lbs) (8.1-8.7) associated with the Form Rs for those chemicals for which all reporting qualifies for Form A	Quantity (lbs) (8.1 + 8.8) associated with the Form Rs for those chemicals for which all reporting qualifies for Form A
<b>Modified Basis for Threshold (8.1, 8.6, and 8.7)</b>	500-Full Use	1,399,675,821	5.34	5,864,152	.10	52	42	363,517	1,735
	1000	1,698,504,017	6.48	8,596,556	.15	60	56	591,717	5,869
	2000	2,012,156,655	7.67	13,683,292	.24	68	77	615,461	13,790
	5000	2,563,181,746	9.78	27,691,739	.48	81	119	863,345	40,369

Notes:

1. Total Production-Related Waste (sum 8.1 through 8.7) for reporting year 2001 is 26,221,390,674 pounds (PBTs were excluded from this total).
2. Total "Releases" including releases from non-production related activities (sum 8.1 plus 8.8) for reporting year 2001 is 5,810,918,783 (PBTs were excluded from this total).
3. Chemicals for which all submissions may be limited to Form As (522 toxic chemicals were active in the TRI program in reporting year 2001. Total chemicals reported in 2000 was 528).